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ABSTRACT

This overview of an evaluation of prime sponsor implementation of the Youth Employment and Demonstration Projects Act (YEDPA), offers an interpretation of ten case study findings. It is divided into four principal parts. The first, "Summary of Findings and Recommendations," summarizes findings about local programs implementing YEDPA and suggests strategies and tactics to guide the Department of Labor in forthcoming operations. The second, "Program Experience in Fiscal 1978," reviews administration and operation of local youth programs. Issues covered in this section are linkages between prime sponsors and local schools, the client population, interaction between the summer job program and YEDPA, local accountability, spending patterns, and discrepancies between planned and actual performance. The third section, "Planning for 1978," identifies changes in local programming from the first to second year of YEDPA and analyzes the reasons for the changes and their likely consequences. Changes in procedures and operations, institutional roles, and policy are discussed. The fourth section, entitled "The Local Perspective," adopts the prime sponsor perspective and examines some of the local conditions that have had an effect on YEDPA implementation. Prime sponsor staff stability and the role of regional offices are covered. (MN)

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OVERVIEW

to

THE LOCAL FOCUS ON YOUTH: A REVIEW OF PRIME SPONSOR EXPERIENCE IMPLEMENTING THE YOUTH EMPLOYMENT AND DEMONSTRATION PROJECTS ACT

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This Overview is taken from The Local Focus on Youth. That report also includes case studies, prepared by 10 Field Associates under subcontract to the National Council on Employment Policy.

The Local Focus on Youth is the third in a series prepared for the National Council on Employment Policy, under contract with the Employment and Training Administration, U.S. Department of Labor. The Field Associates and Project Director are encouraged to express their judgments freely. The observations and analysis in that report are their own.

Preparation of the Overview was also supported, in part, by an ongoing grant from the Ford Foundation to the National Council on Employment Policy. The observations and analysis, while based on the case study findings, are those of the author.

For readers interested in referring to the individual case studies, a limited number of copies of the full report is available from the Office of Policy, Evaluation and Research in the Employment and Training Administration, U.S. Department of Labor.

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PREFACE

The Youth Employment and Demonstration Projects Act signed into law August 5, 1977, marked the start of an expanded attack on the problems of youth unemployment. The law, which was left largely untouched in the 1978 Comprehensive Employment and Training Act amendments and, for the bulk of its efforts, looks to the CETA local government sponsor system, introduces several departures from other CETA planning and implementation processes. It stresses more innovation and experimentation on the part of prime sponsors than CETA does, but also provides for several more specific procedural and eligibility requirements than is customary under CETA.

Four programs were authorized under YEDPA. Three were created under the Youth Employment Demonstration Program, now under Title IV, Part A of the Comprehensive Employment and Training Act. The Youth Adult Conservation Corps is authorized under Title VIII.

The Youth Employment Demonstration Program authorizes 3 programs for providing employment opportunities and employment support services, and testing the relative effectiveness of alternative remedies to youth employment problems. The basic purpose of the Youth Incentive Entitlement Pilot Projects is to test whether guaranteeing jobs for 16-19 year-old economically disadvantaged youths encourages those in school to stay, and those out of school, to return. Seven prime sponsors selected by the Department of Labor are testing this notion with saturation projects conducted under a variety of conditions, using different approaches. Ten other prime sponsors are operating smaller projects, limited to tests of specific innovative ideas. The Youth Community Conservation and Improvement Projects (YCCIP) provide job opportunities for unemployed youths, 16-19 years old, doing well-supervised work with tangible outputs that are of benefit to the community. Although these projects are not reserved for economically disadvantaged youth, prime sponsors are encouraged to give them special emphasis in selecting participants. The Youth Employment and Training Program is designed to provide a full range of work experience and employability development services for youths. They are supposed to be targeted for disadvantaged 16-21 year old youths, who are in school or are out of school and unemployed or underemployed. Under certain provisions, some 14 and 15 year old youths may participate, as well as some non-disadvantaged youth. Prime sponsor programs under this subpart are expected to link up with local education agencies, so that the base of resources for youths can be broadened, and so, perhaps, some of those resources can be better coordinated. Funds for efforts under both YCCIP and YETP are allocated by formula to all CETA sponsors. In addition to the formula allocations, there are discretionary monies. They constitute about 25 percent of the total funds available under YCCIP and YETP, and support research and special demonstration projects.

The Young Adult Conservation Corps provides jobs and some supportive services to unemployed youth who can be engaged in doing needed conservation work. These activities are conducted under the authority of a tri-partite agreement among the Departments of Labor, Agriculture and Interior.

YEDPA was funded at a level of $1 billion for its first year. The Congress appropriated $233 million for the first year of the Young Adult Conservation Corps, $115 million for the Youth Incentive Entitlement Pilot Projects, $115 million for the Youth Community Conservation and Improvement Projects and $537 million for the Youth Employment and Training Program. $475 million of YEDPA money was carried into fiscal year 1979. Approximately $700 million in additional funds were added to the carry-in and the spending level for the year is expected to be about $1.2 billion.

In order to get an ongoing picture of how implementation of YCCIP and YETP prime sponsor activities is proceeding, the Department of Labor selected the National Council on Employment Policy to do a four-part evaluation. In designing its evaluation, the Council adopted a case study approach. Ten case studies are being prepared by knowledgeable observers for each of the four reports. Each case study examines three to five prime sponsor areas. The evaluators are studying a total of 37 prime sponsorships in 12 states. The sample was chosen, not as a random one, but to represent a cross-section of important prime sponsor characteristics. The selection purposefully focuses on clusters of sponsors to permit analysis of common patterns and variations among them.

Local Focus on Youth is the third interim report in the Council's series of four. It describes and analyzes local experience with YEDPA for the period from late Spring 1978 to late Fall 1978. The full report consists of this Overview and 10 case studies examining experience in the prime sponsor areas, prepared by the following field associates.

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Copies of the full report, Local Focus on Youth, can be obtained from the Office of Policy, Evaluation and Research in the Employment and Training Administration, U.S. Department of Labor.

The Overview to Local Focus on Youth is based on the 10 case studies prepared by the Field Associates. It identifies some of the major themes running through the individual case studies, and also presents an analysis of the diversity of experiences reflected in them. It does not pretend to capture the wealth of information and details in the individual case studies.

The Overview offers one interpretation of the case study findings. It is divided into four principal parts. The first, "Summary of Findings and Recommendations," summarizes findings about local progress implementing YEDPA and suggests strategies and tactics to guide the Department of Labor in forthcoming operations. The second, "Program Experience in Fiscal 1978," reviews administration and operation of local youth programs. "Planning for 1979" identifies changes in local programming from the first to second year of YEDPA and analyzes the reasons for the changes and their likely consequences. "The Local Perspective" adopts the prime sponsor perspective and examines some of the local conditions that have had an effect on YEDPA implementation.

The Field Associates, Rupert Evans, Marcia Freedman, and Garth Mangum, members of the Youth Evaluation Project Committee of the National Council on Employment Policy, reviewed this analysis of the case study findings and commented on an early draft of it. Seymour Brandwein and Robert Taggart of the U.S. Department of Labor also provided valuable comments. Nancy Kiefer helped edit and prepare the manuscript. I am indebted to all these persons for their assistance and cooperation in preparing the Overview. I assume responsibility for its contents.

Gregory Wurzburg
Project Director
February 28, 1979

Acronyms and Abbreviations

BLS	-	Bureau of Labor Statistics
CBO	-	Community-Based Organization
CETA	-	Comprehensive Employment and Training Act
DOL	-	Department of Labor
ES	-	Employment Service
ETA	-	Employment and Training Administration
LEA	-	Local Education Agency
NBO	-	Neighborhood-Based Organization
OYP	-	Office of Youth Programs
SPEDY	-	Summer Program for Economically Disadvantaged Youth
Voc Ed	-	Vocational Education
YACC	-	Young Adult Conservation Corps
YCCIP	-	Youth Community Conservation and Improvement Projects
YEDPA	-	Youth Employment and Demonstration Projects Act
YETP	-	Youth Employment and Training Program
YIEPP	-	Youth Incentive Entitlement Pilot Project

The National Council on Employment Policy is a private nonprofit organization of academicians and practitioners who have a special interest and expertise in the area of manpower. The Council is primarily concerned with furthering research on employment and training problems and assessing related policy issues.

This evaluation was reviewed by the Youth Evaluation Committee of the Council, but does not necessarily represent the views of the Committee members or the Council members.

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SUMMARY OF FINDINGS AND RECOMMENDATIONS

The YEDPA programs that CETA prime sponsors conducted in fiscal 1978 were abbreviated, not really getting underway until the end of the second quarter. Because of that and other one-time conditions, the first year experience is inconclusive. Planning efforts were pressured by a rushed implementation schedule and confusion over funding levels. Operations frequently lagged because of the challenge of finding new program delivery agents, working out cooperative agreements with local schools, and identifying and developing work experience sites. Because experience in fiscal 1978 was short and probably atypical, it cannot be used reliably as a basis for much change in policy. YEDPA needs more time before national policymakers should attempt to change basic policies. However, some administrative tinkering does seem justified.

(1) CETA-LEA Agreements. One of the central goals of YEDPA is to encourage cooperation between CETA prime sponsors and local education agencies (LEAs). It is hoped that closer prime sponsor-LEA relationships will narrow the gulf between employment and training activities and education activities, enhance the education and employability prospects for school leavers, and enrich the in-school experience for youth who might otherwise drop out.

In the first year, joint agreements between CETA prime sponsors and schools were negotiated. Most programs under the agreements were implemented, but because of late starts, ran only briefly. The prevailing pattern is to continue the programs through a full academic year before making major changes.

The Department of Labor ought to resist the temptation to push CETA-LEA cooperation any faster and continue to refrain from putting pressure on prime sponsors. A full academic year of experience seems reasonable and necessary before LEAs will willingly accept much change.

Procedural incompatibilities between prime sponsors and local schools, such as different planning and budget cycles, and CETA funding uncertainty appear only to hinder CETA-LEA cooperation; they do not prohibit it. The serious conflicts arise because of LEA resistance to awarding academic credit for YEDPA activities and targeting YEDPA services within schools.

YEDPA programs have succeeded in putting on the local school agenda the question of awarding academic credit for work experience and career exploration activities. But the task of determining what experience should be awarded academic credit falls primarily on the schools. It is not realistic to expect local sponsors to be much more than catalysts in coaxing schools in the appropriate direction. The Department of Labor should take steps to assure that encouragement, technical assistance and program models for awarding academic credit are filtered down to local schools from the education side of the federal establishment.

While the current regulations governing activities under LEA agreements do not prohibit schools from enrolling "non-eligible" youth in activities other than work experience, the Department of Labor discourages it. But, targeting by income, a central element in the youth programs, is not widely accepted by school administrators. They object to it on political grounds, because keeping students out of activities merely on the basis of family income is not popular among the students who were kept out and may stigmatize the youth who participate. Administrators object on substantive grounds because they do not see family income as a valid indicator of need for employability development services.

The CETA reulations going into effect April 1, 1979, of course, prohibit youths not meeting the income eligibility criteria from participating in work experience and some related employability development activities. But they explicitly permit those youths to receive counseling, occupational information, and placement services. Since targeting provisions generally present one more source of tension in prime sponsor-LEA relations, the Department of Labor should encourage prime sponsors to permit LEAs to take advantage of the relaxed guidelines where such a strategy will facilitate prime sponsor-LEA cooperation.

(2) YEDPA Clients. In order to get the biggest bang for the buck, YEDPA services should be going to those most in need. Overall enrollment data indicates that is indeed the case. But, there is not much evidence that sponsors are establishing special out-reach procedures to enroll certain target groups they select, such as handicapped or juvenile offenders. There is also not much evidence that, having established target groups for special attention, sponsors adapt services to meet the special needs of those groups. The Department of Labor should go further in asking sponsors to (1) explain the steps they will take to assure that persons within target groups are enrolled, and (2) explain the procedural or programmatic adaptations made to assure that clients in the target groups receive the services they need.

As intended, YETP enrollments are predominantly in-school youth, while YCCIP enrollments are predominantly out-of-school youth. However, due to the heavy emphasis in YCCIP projects on activities producing tangible outputs, they are dominated by traditionally-male occupations -- construction, maintenance, and landscaping. This pattern has resulted in under-enrollment of females, even despite the extra efforts of a few sponsors to place young women in the traditionally-male occupations. Short of changing legislation to de-emphasize the production of tangible outputs in YCCIP, the Department of Labor should identify and support local outreach/intake models that have been successful in increasing female enrollments in non-traditional occupations, and urge other sponsors to adopt similar procedures.

(3) YEDPA and the Summer Youth Programs. In order to improve the traditional summer youth program, the Department of Labor encouraged prime sponsors to link it with YCCIP and YETP activities. With few exceptions, local sponsors did just that. The result was that the summer program, which previously had been almost exclusively work experience of uncertain value, included career exploration and other labor market services. There are signs, however, that except for the jobs held by youths employed year-round,

the 1978 summer jobs themselves were similar in quality to those in previous years. It also appears that the enriched programs are not as appealing as straight work experience to youths who just want a summer job. Since it appears that work experience is an essential ingredient for the summer youth program, but enriched services are not, the Department of Labor should put an emphasis first on assuring the quality of summer jobs, and then on developing auxillary services. But if SPEDY continues to serve a predominately in-school population, the Department of Labor should encourage sponsors to provide auxillary services as much as possible during the school year.

(4) Accountability. Prime sponsors are held accountable to both federal and local officials on matters of compliance to regulations and the law. But there is little accountability for the effects of programs on the employability of clients. Because such effects are difficult to assess, because there are few rewards for evaluating them, and because such evaluation costs in time and resources, there is little incentive for sponsors to shoulder the burden for that kind of accountability. Despite this atmosphere which, it might be expected, would discourage prime sponsor innovation and experimentation, many are attempting new strategies and documenting the results. But the increasing public attention on fraud and abuse in CETA may squeeze out those attempts.

If the Department of Labor wants to encourage more innovation and experimentation and a willingness on the part of sponsors to assure responsibility for program results, it should consider a system of incentives for such activities, to make them worthwhile.

(5) Spending in 1978. During fiscal 1978 prime sponsors struggled to get YEDPA off to a (late) start, and during the summer tried to pace the spending so that they could carry 27 percent of their 1978 allocations into 1979. They succeeded with only minor disruptions. There was little that the Department of Labor could do to either foresee or control the events that dictated a sizeable carry-in. However, the spending messages were not transmitted uniformly nor clearly to the local sponsor. This caused unnecessary confusion. The Department of Labor ought to review the procedures for transmitting information to local sponsors and make the necessary changes so that sponsors can be assured of receiving timely and accurate notice of policy changes.

(6) Planned and Actual Performance. Although the available data do not permit precise analysis of planned and actual performance, some overall patterns can be inferred from them, Per-enrollee costs for YCCIP work experience ran below expected levels because turnover was higher than anticipated. Many of the YCCIP "terminees," in fact, went into Title I or SPEDY, but a large proportion left YCCIP because supportive services were lacking, or to take higher paying jobs elsewhere. Discrepancies between planned and actual per-enrollee costs for YETP usually reflect little more than mis-estimation in the planning stages. Faulty cost estimates were a more frequent source of error than faulty enrollment estimates. This was presumably due to the number of unknown cost variables involved in establishing the new program.

(7) Planning for 1979. The planning phase, so important to the development of new programs, was less rushed during the 1979 cycle than in the previous year, but was still unsettled by uncertainty over CETA reauthorization and funding levels. Some sponsors made changes in procedures, institutional relationships, and basic policies, but many have taken a wait-and-see attitude, wanting more experience before striking off in new directions. It seems that sponsors are quite willing to make further changes in their youth policies and programming. What is not so clear is whether most of the local change induced by YEDPA has already occurred.

(8) The Local Agenda. Local administrators share many of the concerns of YEDPA administrators in Washington. But they have other problems that YEDPA has aggravated to some degree, but which are intrinsic to the entire CETA system of decentralized-decategorized manpower program delivery. Two of them are staff turnover and prime sponsor relations with the regional offices of the Department of Labor. This evaluation -- like others -- has found some CETA staffs to be plagued by low morale and high turnover, apparently caused by political vulnerability, having to serve two masters -- one local and the other federal -- and having inadequate time for program planning and development.

Sponsors are also experiencing frustration with regional offices. Some of it springs from the natural tension between federal and local authority in a decentralized-decategorized approach to CETA. But more can be traced to a lack of role definition for the regional network and an inability of it to execute in concert with the national office program offices.

The case studies provide insufficient basis for definitive recommendations; they merely identify some of the sponsor problems that are not so evident (nor important) from the federal perspective. The Department of Labor, however, should examine these problem areas in some detail to determine what their effects are and what measures can be taken to get around the problems.

YEDPA PROGRAM EXPERIENCE IN FISCAL YEAR 1978

Six areas in the record of accomplishment for fiscal 1978 stand out for special attention: linkages between prime sponsors and local schools, the client population, interaction between the summer job program and YEDPA, local accountability, spending patterns, and discrepancies between planned and actual performance.

The Evolving Roles of Local Education Agencies in Local Manpower Programs for Youth

One of the more ambitious aspects of YEDPA is the heavy emphasis on bringing together prime sponsor youth programs and local school systems. There is an assumed complementarity between the CETA and education systems with respect to the populations they serve and the services they provide. The hope is that mechanisms, such as the provision setting aside 22 percent of each sponsor's YETP allocation to be administered under the terms of a joint CETA-LEA agreement, will force the two establishments to act more in concert to leverage local resources into a comprehensive base of employment and training services for youth.

The Council's first report on YEDPA implementation told a story about optimistic prime sponsor plans for CETA-LEA agreements. They reflected more aspirations of the sponsors than of local education authorities, and certainly more than was realistic. The second report documented problems encountered implementing the first hasty plans: a breakneck implementation pace that left little time for considerations about quality; incompatibility between prime sponsor and LEA calendar years; disagreements over whether academic credit was appropriate for employment services or work experience. There were positive results to report, but expectations in the first LEA cycle ending in June outran what was feasible.

Expectations for the start of the second academic year may have been lowered, but, at the margin, sponsors and LEAs seem to be moving in the direction of more progress. More significantly, much of the dust has cleared and it is easier to make some judgments about the relative importance of factors influencing joint CETA-LEA undertakings.

Except for attempts to fine-tune first year efforts, few substantive changes were made in LEA programming for the 1978-79 school year. But, the steady state does not necessarily indicate apathy or an inability to change; rather, the prevailing opinion for LEAs and sponsors alike, is that the first year provided an inadequate test and the first year's experiences were not representative of what could happen. In most sponsorships, the LEA share of YETP funds, which frequently exceeds the 22 percent minimum by a large margin, remains the same.

There are, however, some isolated cases in which changes have been made and can be attributed to sponsors and LEAs rethinking the premises on which the agreements are based. In Sonoma, where the LEA agreement for the 1978-79 school year was made much more specific than for the previous year, LEA staff resent CETA "non-professionals" telling them what services to provide to whom. The schools there also see the LEA agreements and CETA "... as a channel through which county and city governments can exert influence on 'independent' school districts." (John Walsh, Page J-27). The Oregon Balance of State prime sponsor will be increasing the proportion of YETP funds going to the schools. But prospects for dramatic change there are not promising because of uncertainty over school budgets.

Award of Academic Credit

The award of academic credit for career development classes and job competencies is the most visible and controversial product of CETA-LEA cooperation. It is a device that requires a high degree of cooperation between sponsors and LEAs, and it is seen as being important as an extra incentive to keep youth in an education setting or to at least keep them in contact with the education establishment through alternative approaches. It is also a mechanism encouraging more active participation by schools in helping youths think about the world of work and draw some kind of connection between their early work experiences and later careers.

Though this topic will be treated in more detail in the final report of this evaluation, it merits attention here because it is still the most debated issue among sponsors and LEAs and the issues surrounding the award of academic credit for CETA activities are far from settled.

In some cases, sponsors had ambitious first year plans for awarding academic credit to YEDPA participants, but were stymied by LEAs citing the need to go through clearance procedures. States set the basic rules on the award of academic credit, but usually leave most of the discretion with local authorities. Delays in the first year were encountered when LEAs were slow to award credit because they were uncertain about their authority or because they were biased against awarding academic credit and preferred not to without a specific state mandate. The state department of education in Ohio is a case where precise guidelines on academic credit are lacking and local authority is uncertain. In Clark County, the LEA involved in YETP chose to tread cautiously. When it became clear that the state would not provide explicit guidance, LEA personnel -- who had been in favor of awarding credit -- started the approval process in time for the second year. In Greene County, however, where LEA officials were reluctant from the beginning to award academic credit, the schools persisted in their decisions for the second year.

In contrast, North Carolina provided early encouragement from the state level with even the governor getting involved in a campaign to support the the award of academic credit. In Charlotte, local CETA and LEA administrators have developed a good working relationship and made arrangements for awarding

academic credit. But in Durham-Orange, local feelings among LEA staff run strongly against the award of academic credit as well as most of the ideas behind CETA-LEA agreements. On the sponsor side, staff think the school principals and guidance counselors "... resent what they perceive as an overload on their staff caused by CETA people 'coming for help!'" (R. C. Smith, Page H-13). But the resentment that sponsor staff perceived may have sprung from some of the CETA-LEA "joint" activities which were established with little regard for school policies. For example, as part of the summer program, the sponsor paid 25 high school seniors while they were making up for school work they missed during the previous year. School officials saw the program as providing an unfair subsidy for students to do work that others had to do as part of their normal school requirements. But there are more basic prejudices among schools in North Carolina that even more tactful sponsors are having difficulty with, state level encouragement notwithstanding. There is fierce resistance to any measures such as academic credit that would establish alternative modes of education for drop-outs. School administrators resent CETA for "rescuing" drop-outs and the objective of getting them back into school is abhorent. One principal complained that "... the very ones that had been kicked out used CETA as a way to get back in the system." (R. C. Smith, Page H-14). As a consequence of the ill-feeling that some LEAs in North Carolina have towards CETA and their basic disagreement with YEDPA objectives, they are making no attempts to award credit, state leadership notwithstanding.

The introduction of competency examinations in North Carolina and California has been cited as another point of resistance to the award of academic credit. With seniors having to demonstrate competency in verbal and math skills, educators are becoming more reluctant to award academic credit for activities not aimed to improve those skills. Some Lansing area schools use a similar line of argument and do not award academic credit because administrators feel that awarding academic credit for work experience or career exploration services would be at the expense of academic requirements.

Perhaps the most fundamental objection by LEAs to academic credit provisions revolves around a turf issue: who certifies classroom or work experience for academic credit? Local educators resent prime sponsor personnel having any authority in this area; but prime sponsor administrators see local schools frequently as being reluctant to incorporate employment and training activities into curriculum without outside (CETA) pressure. The tension has been resolved where LEAs have worked out with prime sponsors a division of labor in which LEAs certify training and work experience and share with prime sponsor personnel, monitoring responsibility.

Other Issues Affecting CETA-LEA Relations

The academic credit issue is important but not decisive in determining how sponsors and LEAs fare in their joint ventures. Some other factors are influential. Outside the area of academic credit, the targeting provisions of YEDPA raise the most red flags. It is an area, not cited very much in earlier

reports, that poses real threats to CETA-LEA cooperation. The emphasis on serving drop-outs is not always popular with LEAs, but targeting by income is resented even more. A report on a LEA program in the Connecticut Balance of State sponsor was emphatic on this point: "... eligibility requirements based on family income should be eliminated or raised substantially in order that all youth who could benefit from the program be served." (Peter Barth, Page A-23). The reasons for the unpopularity of the income cut-off are predictable. Economic need is not seen as a valid or reliable indicator of employability development need. The schools, rarely having to take income income criteria into account for other activities (and resenting it when they do), are unhappy with the YETP provisions. For the LEAs responsible for certifying eligibility in their programs, the task of securing the appropriate evidence is an onerous one.

The CETA-LEA conflict caused by targeting provisions is more stubborn and irreconcilable than the academic credit conflict. It is symptomatic of the divergent goals that local sponsors and local schools serve. Aside from the fundamental goal conflicts which make basic institutional change difficult, neither LEAs nor prime sponsors have much maneuvering room for working out an accomodation. LEAs are not in politically defensible positions if they shift large amounts of resources to serving only economically disadvantaged youth. Likewise, prime sponsors are not in a legally (nor in many cases, politically) defensible position to serve non-economically disadvantaged youth.

Previous reports documented the difficulties in the first year that were encountered because of late starts and the incompatibility of the CETA funding year and the school year. Although many of them were one-time start-up problems, and the incompatibilities can be overcome even if they cannot be eliminated, they are a source of tension. In DeKalb County, an LEA administrator was very irate over uncertainties about the amount of money and when it would be available. In Lane County, though the LEAs are receptive to the goals of YEDPA and working with the prime sponsor, they had only three weeks to develop their 1979 plan and so could not make major changes.

YEDPA guidelines, appropriately, do not go very far in specifying how sponsors should develop LEA agreements or who in the schools they should work with. But in a hierarchy as stratified as the public school system, the matter of who in the schools works with sponsor staff, and how they feel about YEDPA may also be determinants of program success.

Returning to North Carolina once again as an example, state level leadership has had little effect on how popular local programs have been or on whether academic credit was awarded. But in earlier reports, it was found that despite the low opinion that one principal had of YETP, a vocational educator with direct responsibility for the program in that principal's school was very enthusiastic and supportive. There are other instances of divergencies among the state, county/district, and school levels that support an image of poor communication and interrupted authority and guidance with respect to school policies on CETA-LEA ventures.

Within individual schools, activities under LEA agreements are usually located in the vocational education area. The programs based on vocational education are important for shifting enrollments more towards underachievers who, in the past, have not been served well in that area. But to the extent that schools have had prior experience with CETA prime sponsors, much of it has been through secondary vocational education and post-secondary vocational/technical schools.

The activities that offer the potential for the greatest departure from past joint CETA-LEA activities, are those run through the non-vocational education components of LEAs. They are bringing a different group of LEA staff into contact with CETA. In some LEAs, like one in Westport, Connecticut, which works with the Balance of State sponsorship, the school work study counselor and headmaster provide access to the schools. But usually counseling staff is avoided because they are considered to be already overworked. Instead, the emphasis has been on the career education area, where there is popular interest in linking education and employability development. Some of the activities developed under the LEA agreements are adapted to career education material and vice versa. The danger here is that the career education-YEDPA activities will coopt the energies that might better be used to channel underachievers or potential drop-outs who are YEDPA clients into more appropriate educational activities such as remedial education. It is not at all clear that YEDPA is having an effect on changing the way schools do part of their traditional work in contrast to adding on some new roles.

YEDPA Clients in 1978

YEDPA is most important for its focus on youth. But local sponsors have a large degree of discretion in choosing which youth to serve: economically disadvantaged or non-disadvantaged; in-school or out-of-school; handicapped or non-handicapped, and so forth. Because of the range of options, the Department of Labor stressed certain priorities in the hope that sponsors would divert YEDPA resources to those most in need: economically disadvantaged youth and drop-outs for YCCIP and in-school for YETP. Prime sponsors adopted the national priorities for their own rhetoric and developed targeting strategies. The results, however, were not the same for all sponsors.

Comparing Enrollments in YCCIP and YETP

As YEDPA was being implemented, there was concern among national policymakers for whether all the efforts of present YCCIP and YETP as discrete approaches would actually result in programs that could be differentiated at the local level. One way of determining whether the programs are perceived as serving different purposes is to see whether they served different clienteles. In fact, a breakdown of client characteristics for YCCIP and YETP enrollments shows significant and systematic differences between the two program populations. In YCCIP nearly three out of every four enrollees were male, compared to roughly one out of two for YETP. Sponsors enrolled a

slightly larger proportion of non-white youth in YCCIP. Four-fifths of the YCCIP enrollees were out of school compared to two-fifths of the YETP enrollees.

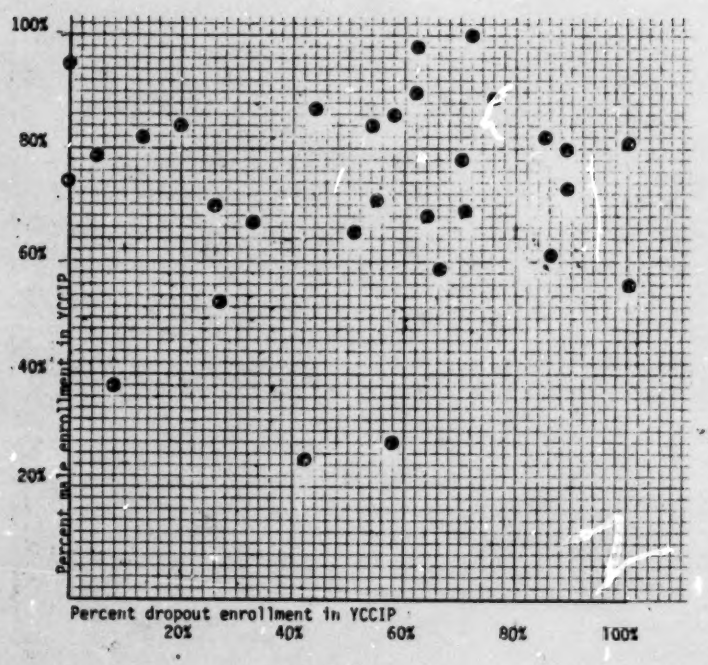
The disaggregated figures tell a more complete story, however, about the specific program characteristics that differentiate YCCIP and YETP. They also offer insights into prime sponsor targeting policy and the interaction of targeting choices and program activity choices.

YCCIP was intended by national policymakers to be a work experience program, short on frills, but long on well-supervised jobs with tangible outputs. Nominally targeted for 16-19 year old jobless youth, it was envisioned that YCCIP would serve mostly out-of-school youth -- drop-outs and graduates. In fact, while the aggregate enrollment data bear out the emphasis on out-of-school youth, in-schoolers outnumbered out-of-schoolers in nearly a quarter of the sponsors studied, and students comprise at least a third of the YCCIP enrollments for most prime sponsors. Many of the sponsors' programs with high in-school enrollments in YCCIP are run by local schools. The patterns there reflect a mixture of deliberate policy to serve an in-school population, and to a lesser extent, an incidental fact that schools are serving those clients they know best and are able to recruit best. El Paso and Clark County both decided to focus YCCIP on in-school youth and involved LEAs as program agents for YCCIP. Detroit and Kalamazoo also relied on LEAs as YCCIP agents and enrolled precominantly in-school youth. But, not all the sponsors with predominantly student enrollment in YCCIP had schools conduct YCCIP activities. Albuquerque, Coastal Bend, Sonoma, Oakland, Marin and Lane all relied on CBOs or public park/land management agencies. However, nearly all of these, as well as the school-run YCCIP projects, augmented the work components with training, extended orientation, or career exploration components.

Services beyond straight work experience were not confined to programs serving students. Sponsors enriched YCCIP even in areas where out-of-school youth was the predominant target. There, however, junior colleges and community colleges were frequently involved, especially where academic credit was awarded.

Unfortunately, because of certain design characteristics of YCCIP, prime sponsor enrollments are heavily male. The concentration on drop-outs is identified popularly as one contributing factor. It is asserted that because a lower proportion of young females than males drop out of high school for the purpose of going to work, the population of 16-19 year old drop-outs interested in work is mostly male. In fact, there appears to be very little relationship between the proportion of drop-outs and proportion of females in YCCIP enrollments. What appears to be more important is the emphasis on devoting YCCIP jobs to producing tangible outputs. This policy skews the job distribution in favor of construction, maintenance, and other traditionally male occupations (See Figure A). Despite the efforts of prime sponsors to

Figure A



place females in those occupations, only 29 percent of the YCCIP enrollments of sponsors in this evaluation (25 percent nationally) were females. The exceptions, areas where YCCIP had a large proportion of females, help prove the point.

To the extent that YCCIP activities were not in areas that involved male-dominated occupations, they enrolled more females. Marin, Kalamazoo, and Northeast Georgia, the only prime sponsors whose YCCIP enrollments were predominantly female, all had YCCIP activities that did not entail much building rehabilitation, winterization, or construction/maintenance. Instead, they were more service oriented. The two largest projects in Marin were pregnancy prevention and service outreach. Northeast Georgia's YCCIP project had a carpentry component and a larger day care component. There were no females in the carpentry project, and only one male in the day care project. Kalamazoo's YCCIP never got up to full strength because the main project there was cancelled. But the balance of the program, which was more than three-quarters female, was concentrated in the social service area.

Even the male/female distributions for sponsors with high proportions of males overstate the success that sponsors had enrolling females in non-traditional jobs. This is because many of the sponsors that enrolled at least a few females, sponsored YCCIP projects that included service activity featuring work assignments that were not male dominated occupations. Eastern Middlesex, for example, supported an Alcohol Awareness YCCIP project. Boston sponsored one in which youth were assisting elderly persons in their homes. Other sponsors, sponsoring a multitude of small projects with their YCCIP funds, had similar social service components.

It does not appear that sponsors were following a policy of keeping females out of traditionally male occupations. Some of them went to great lengths attempting to enroll females, counseling, persuading, and stretching eligibility requirements to the limit. But the efforts were not particularly successful because the YCCIP model does not adequately recognize the needs of all segments of its target population. As one evaluator said: "Prime sponsors were unable to gear YCCIP projects to the needs of specific youth ... /they/ ... were designed and funded first; the search for youth to fill the resulting slots occurred second." (John Walsh, Page J-28).

Income characteristics is another point of comparison between YCCIP and YETP enrollments. They are noteworthy because the eligibility criteria for the two programs varied. YETP enrollees must be from families whose incomes are 85 percent of the BLS lower living standard or less, but YCCIP was more relaxed. While sponsors are encouraged to target it for economically disadvantaged youth (from families with income 70 percent of the BLS lower living standard or less), they are in fact free to enroll clients without regard to family income.

Despite the relaxed standards for YCCIP, sponsors tended to enroll economically disadvantaged in both. Eighty-three percent of the enrollments in YCCIP in the sponsor areas studied were economically disadvantaged compared to 89 percent for YETP. Nationally, 84 percent of the YCCIP enrollees were economically disadvantaged; ironically, this was 2 points higher than for YETP.

In the first two reports of this evaluation (February 1978 and August 1978), assessments investigating prime sponsor plans and early operations found that local administrators were indeed targeting YCCIP for economically disadvantaged youth. They were enrolling relatively few non-disadvantaged youth because there was a local policy of serving those most in need and because to do otherwise would have been politically dangerous. It is not surprising, therefore, to see sponsors enrolling approximately equal proportions of economically disadvantaged youths in both YCCIP and YETP. In only one case did a sponsor enroll appreciably more in YCCIP, and that was Albuquerque. The presence of an entitlement program there contributed to the relative over-enrollment since the entitlement activities enrolled a large portion of likely YETP candidates who were economically disadvantaged. The only other real aberration was DeKalb which reported enrolling no economically disadvantaged youth in YCCIP and 67 percent in YETP. But the YCCIP program there was small (It enrolled seven youth and cost $4,400) and a low priority for the LEA running it.

On the whole, there were relatively few prime sponsor operations where fewer than 80 percent of the YETP or YCCIP enrollments were economically disadvantaged.

Table 1

Sponsors with programs in which less than 80 percent of the clients were from economically disadvantaged families

Prime Sponsor	YETP	YCCIP
Albuquerque	59%	
Atlanta		71%
Coastal Bend		59%
Connecticut BOS		55%
Cook County		56%
DeKalb County	67%*	
Kalamazoo County		50%
Marin County	79%	66%
Rockford	74%	78%

*Corrected February 26, 1979

Some of the explanations for the "low" enrollments of economically disadvantaged youth parallel those explaining large differences between YCCIP and YETP enrollments of economically disadvantaged youth, but some other factors seem important, as well. Albuquerque, Marin, and Connecticut Balance of State all encountered difficulty in finding economically disadvantaged youth. In Albuquerque the entitlement project was conducted in an area containing a large proportion of the minority population in the prime sponsorship. Marin County is a wealthy bedroom community with one of the highest per family incomes in the country; economically disadvantaged youth are few and far between. The Connecticut BOS YCCIP activities were conducted in rural areas of the state which do not contain the pockets of extreme poverty found in center cities. In Cook County, municipalities sponsoring YCCIP work experience positions were concentrated in relatively well-off areas, because poorer municipalities were less able to sponsor YCCIP activities. This reduced participation of economically disadvantaged youth because some of the municipalities with YCCIP slots had residency requirements, and transporation to the ones without residency requirements frequently was problemmatical. Rockford draws from an area which is not as economically hard-pressed as some other sponsorships and does not have the concentration of economically disadvantaged youth that others have. Although both DeKalb and Atlanta could have served more economically disadvantaged youth, they chose not to, setting low targets that they actually met or exceeded.

The relative proportion of non-white enrollments in YCCIP and YETP is another point for comparing the two programs. The data reported in the case studies are not sufficiently complete to support definite conclusions,

but the aggregate data indicate fewer non-whites in YCCIP.* Disaggregating the numbers, however, explains much of the differential. In the cases of extreme differences -- more than 15 percentage points -- there are usually some obvious explanations (Ironically, in four of seven extreme cases, the proportion of non-white youth is greater in YCCIP than in YETP).

Clark County's YETP activities were run in the city of Springfield where the low income population is predominantly black; the YCCIP project was handled by the LEA in the rural area of the county surrounding Springfield where the population is virtually all white (a CBO in the city of Springfield was selected to run the YCCIP project for 1979). DeKalb's figures ought not be taken seriously since YCCIP was so small. There is some distortion in the Oakland figures because youth counted as white include Hispanic youth. But there, as in Waterbury, the presence of the schools in YETP, and their absence in YCCIP, may be having efforts (although opposite for the two) on enrollment differentials. Portland's YCCIP enrollment is concentrated in a largely minority center city area, and 77 percent of the enrollment consists of school leavers. Minority enrollment is 16 points higher there than in YETP where the activities are aimed more for in-school youth and cover a much wider geographical area. Rockford's YCCIP simiarly concentrates on drop-outs in an area that is disproportionately nonwhite.

The differences in enrollment patterns for the other sponsors do not appear to follow any systematic pattern. Local administrators, however, have cited two pressures that could influence minority enrollments for YETP and YCCIP where the programs are targeted for different areas or provide different services.

One pressure is to keep YEDPA from being seen as an extension of public assistance and social service programs. This was a concern cited among sponsors in North Carolina and Georgia, two areas where poverty is most acute among blacks and where the welfare system is seen as serving a predominantly black population. Northeast Georgia planners have hoped to appeal to white economically disadvantaged youth as well as black youth. In Charlotte, vendors who had been accustomed to serving black youth in other CETA programs were instructed on how to recruit white youth as well. In both these areas, non-white enrollments have been in excess of 75 percent (and their proportion in the eligible population), so the emphasis on getting a better racial mix makes sense. Sponsors in Oregon and Washington expressed a different kind of concern as CETA -- through YCCIP and YETP -- expands its institutional base and provides for more than work experience and income. It is related to the concern of LEA officials who are reluctant to target by income. They believe that as youth services emphasize much more than income transfer (an implicit objective of SPEDY), income criteria do not capture all the elements of need. They think that as services expand to drop-out prevention

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*Because the prime sponsors in the study include areas with heavy representations of minority youth, the minority enrollments are not representative of enrollments for all sponsors nationally. Furthermore, national enrollment data do not indicate different proportions of non-white enrollment for YETP and YCCIP.

and career development, eligibility should hinge on other criteria in order to permit enrollment of non-economically disadvantaged youth who also lack alternatives. Officials in Connecticut expressed similar concerns.

Matching Services to Client Need

Presumably, one of the reasons for identifying target groups is to compensate for the fact that particular would-be clients would otherwise not receive services they need. But, aside from enrollments of groups such as women, drop-outs, economically disadvantaged and minority youth, the performance of prime sponsors in targeting services to those with special needs and adapting services to meet special needs was lackluster. It does not appear that targeting provisions provided any more assurance that target group clients would be enrolled than in the absence of such provisions. Most prime sponsors identified target groups that would in all likelihood be enrolled in YEDPA, and they specified enrollment goals that they would very likely have reached in the absence of special provisions, given the distribution of such groups in the eligible population. Many, for example, identified as a significant segment youth from families receiving public assistance. Given the close ties that many sponsors have with local social service agencies, they had no trouble enrolling these youth. Greene targeted services for "poverty youth," in-school youth, ex-offenders, in-school special education clients, and drop-outs. But because the LEA was given a large role in client recruitment, the sponsor fell short on drop-out and ex-offender enrollments. Clark County added Spanish speaking and native Americans as target groups after the fact by virtue of serving them. Similarly, in Atlanta, a city in which 15,000 youth were arrested in 1976, planners hoped to enroll 26 young offenders in YCCIP. However, no special steps were taken to reach this population, so only five were actually enrolled.

There were some exceptions in which "targeting" goals were more than wishes or guesses about likely enrollment distributions, in which deliberate steps were taken to reach specific groups, and in which services were adapted to special needs of target segments. Atlanta, with a 1 percent Hispanic population, identified Spanish speaking youth as a target group after a Hispanic CBO was chosen as a YCCIP agent. Spanish speaking youth comprise about 3 percent of the YCCIP enrollment there. In Lansing, 21 percent of its YCCIP enrollees were ex-offenders. Lane County undertook a special effort to serve ex-offenders and capitalized on its established linkages with the juvenile correction agency there; they comprise 28 percent of its YETP enrollments. Lane County also designated mentally retarded youth as a significant segment and designed a program matching retarded individuals with other YETP clients for training and work experience. As an outgrowth of a local goal to make YEDPA "... become more influential in shifting the priority from work to school," Rockford has designated a new target: those with less than a high school education. The group includes "drop-outs" but is identified in such a way as to be matched with local programming that depends heavily on directing the youth back into school.

Except in a minority of cases such as these, sponsors did not carefully consider their choice of target groups and establish specific outreach strategies adapted to penetrating the target groups. And again, with few exceptions, sponsors did not go much beyond what the Department of Labor required in adapting program services to the needs of particular target groups.

Interaction of YEDPA and SPEDY

In every year since 1965, the federal government, first through the Office of Economic Opportunity and later the Department of Labor, has supported a summer employment program for economically disadvantaged youth. Before the Comprehensive Employment and Training Act, the summer programs were conducted as an extension of the Neighborhood Youth Corps In-School programs. Since the summer of 1974, the Summer Program for Economically Disadvantaged Youth (SPEDY) has been funded as a special purpose national program until Title III of CETA (Title IV of CETA as amended in 1978).

After thirteen seasons, SPEDY and its predecessors have been marked by a number of patterns. Although the programs have been virtually assured every year, details on allocations, eligibility, and other regulations rarely have been promulgated earlier than mid-Spring. This has made it difficult for local administrators to incorporate certain important information into their strategic planning. Once allocations and regulations have been announced, local planning has been a rushed process of preparing grant applications and bringing program details into compliance with regulations.

The summer programs have been hastily implemented, marked by the sudden enrollments of large numbers of youths to work in short duration (8-10 weeks) jobs. The challenge of the logistics of starting up a short-term program that increases local youth manpower program enrollments by an order of magnitude of up to ten, and seeing that enrollees get worksite assignments and at least minimal supervision and paychecks has been formidable, complicating the task of providing high quality work experience and matching job assignments with enrollee interests. Where there has been recognized need for mid-program changes, they have been hard to implement in time to take effect.

Because of the size, the emphasis on work experience, and the logistical problems that characterize the summer programs, they have taken on a character of their own and have not been coordinated with other programs to any great extent. Furthermore, before 1978, there were no year-round programs (except for the Neighborhood In-School Program) aimed at the same population the summer programs have served. Youths have been the biggest participant group in CETA title training programs, but they have been older than the typical summer program youth, have had different kinds of needs than the summer youths and are subject to different eligibility tests. Funding and operational uncertainties have also made it more expedient for local sponsors to keep the summer program isolated from other manpower efforts, thereby minimizing opportunities for discontinuities in services and other disruptions caused by problems in the summer programs.

Yet despite the uncertainties in federal plans for the summer youth programs, the hectic pace of implementation, the crash style of administration, and the isolation from other manpower programming, the summer youth program has achieved, over the years, some degree of success. It has evolved into a stable, well-oiled component of local programming. Before the advent of YEDPA, it had reached the point where it provided in a reliable way some work experience (of uncertain value) and earned income for program enrollees. In 1978 SPEDY provided part of the basis for expanded, year-round programming for youth that was encouraged by YEDPA. There is some evidence that as a result of the presence of YCCIP and YETP, the 1978 summer youth program was different from and improved over earlier programs.

SPEDY Planning and Implementation

Planning and implementation of the 1978 SPEDY program demonstrated the benefits of some consistency in basic program parameters. Although the summer grant application package and regulations were not available to prime sponsors until mid-May, the delays had no apparent effect on program designs, because planning took place largely independent of the grant application process. In Portland, the former SPEDY manager noted that local administrators "... started getting ready early this year and had more planning time than ever before." (Bonnie Snedeker, Page I-19). A planner in Chicago said that if planning had waited for the grant application package, it would have been too late to get the program off the ground. To the extent planning problems were evident, they seemed to have been a function of substantive difficulties. Because Rockford, for example, "used SPEDY to introduce a new focus on education" (Myron Roomkin, Page G-25), the process was not as straightforward as usual.

Not only does the process of SPEDY planning appear to be "institutionalized," but it appears that local planners are learning from experience. In Atlanta, SPEDY planning was folded into overall youth planning to save duplication and to bring some cohesion to local youth policies. Nearly everywhere, overall enrollment plans were much closer to actual enrollments than under YETP or YCCIP. Even in Columbus, where YETP and YCCIP start-up activities were beset by delays and problems, all aspects of the local summer plan were implemented.

Program Design

It is difficult to draw conclusions from available evidence about the effect of YCCIP and YETP on planning and implementation of SPEDY. It might be inferred, however, that the presence of YEDPA programs helped provide a context, not present before, in which SPEDY could be viewed as one piece of a larger local policy. The basis for that judgment is the way in which SPEDY was connected with other youth programs. SPEDY has been conducted in the past as an independent program, isolated from other CETA activities.

This year it appears that local planners capitalized on some of the complementarities between SPEDY and YEDPA programs as the basis for linkages and as a basis for adaptations in SPEDY program designs.

In the past SPEDY has been characterized almost exclusively as a work experience program. It enrolled large numbers of youth, pushed them through a 25-hour per week, 8-week work experience and terminated them. The popular wisdom was that time did not permit quality jobs and that the overall experience was most useful for its income transfer results. Although there were no miraculous breakthroughs on job quality this year, two adaptations were found. One was the model in which YETP clients participating in enriched work experience programs stayed on the same job site, but were paid from SPEDY funds. The other was the model in which summer-only enrollees received the usual work experience assignment, but also took part in career exploration programs.

The YEDPA enrollees who transferred into SPEDY for the summer, in fact, stayed on their "year-round" worksites, but were paid with SPEDY funds. In most cases, youths had their work schedules expanded from 10-15 hours per week to 25-30 hours per week. Hourly wages usually remained the same. Of the YEDPA enrollees who transferred to SPEDY, most were from YETP activities, because YETP serves a predominantly in-school population. YETP-SPEDY-YETP transfers were adopted by some local sponsors as a matter of policy and occasionally as a matter of necessity when sponsors were forced to carry 1978 funds into 1979. A staffer in Kitsap County said that "... being able to transfer YETP and YCCIP participants to SPEDY saved our necks ...." (Bonnie Snedeker, Page I-20). The tandem arrangement provided a continuum for enrollees who wanted sustained work experience. For the contractors it meant more administrative continuity and the opportunity to work out bugs.

There were some prime sponsors, however, that worked to keep YCCIP and YETP activities and enrollees separate. Albuquerque and El Paso kept YCCIP and YETP entirely separate from SPEDY and Title I youth activities. Clark County had actually planned for close integration between SPEDY and the year-round YETP. The regional office, however, apparently at variance with national policy, stepped in saying that such integration could not be done and that the programs had to be kept separate.

Even where SPEDY was viewed as a separate program, and may or may not have been part of a service continuum for youth, prime sponsors frequently linked it with YETP and sometimes YCCIP through administrative measures. In Clark County, for example, where the federal representatives had ruled out any formal links between SPEDY and YETP, the sponsor moved SPEDY-bound YETP enrollees from one program to another with a change of status notice. It also used its central intake as an early decision point to decide whether new applicants should be referred to the work experience of SPEDY or the more varied career exploration services of YETP. The location of SPEDY worksites at YETP worksites and the use of the same contractors to deliver SPEDY and YETP also blurred the distinction between the two programs. In Grand Rapids, two-thirds of the YEDPA contractors delivered SPEDY programs. The consortium has encouraged this kind of consolidation by issuing a single request for proposal for YCCIP, YETP and SPEDY.

Regardless of how SPEDY was handled, its program design was affected by YETP. Because of the cross-fertilization, this year's summer program was more than the customary straight work experience. Greene County, for example, ran SPEDY completely independent of YETP, but departed from past practices by providing vocational education experience and labor market information to participants. The SPEDY orientation was modeled after the YETP world-of-work introduction. In the Lansing Consortium, planners fashioned SPEDY after the career employment experience activities in the YETP in-school program. The carry-over of program styles was enhanced by contracting with the YETP deliverers for the summer program. In Atlanta planners refunded with SPEDY money YETP career exploration projects whose program cycles had been completed. Cobb County also expanded its summer program beyond work experience, providing a career exploration reading program and a small vocational exploration component, both similar to components of their YETP programs. Even in Detroit, where a sponsor administrator explained that the usual contractors were delivering SPEDY, there were more provisions for ancillary services than in the past.

It appears that in an effort to upgrade SPEDY, the strategy is to shift its emphasis from straight work experience to a greater mixture of services that capitalizes on YETP experience. But the transition is not without its potential pitfalls. First, less work experience may not be desirable for the predominately in-school population that SPEDY is serving. A counselor in the Lansing Consortium was concerned about it taking on "too much of a school mentality" (Peter Kobrak, Page C-31) in serving youths who need a break from the regimen of school. Staffers in Portland also complained that enriched programs were not able to compete with straight work experience; the implication is that if SPEDY changes too much to a mixed service program, it may lose some of its popularity among youths. A second pitfall of this strategy is that the emphasis on enriched services may be diverting energy from efforts to improve the quality of summer work experience.

Service-Seeking Strategies of Youth

With the proliferation of youth programs permitting different service components, eligibility standards, and occasionally pay rates, youths might be encouraged to shop for programs. In fact, this did not occur very much in 1978. During the summer, although programs were somewhat differentiated with respect to qualitative aspects of design, they were not well differentiated with respect to wages or hours. But, where work experience, program activities, wage rates or hour of work were well differentiated, youths shopped unless restrained by administrative measures.

In the majority of prime sponsorships, all programs paid minimum wage and provided equal hours of work. Youths did not try to go from one program to another. The exceptions are instructive, however. Hartford, which switched enrollees from YETP to SPEDY as a matter of course, had a higher wage structure for YCCIP. However, since the YCCIP projects include a training component and are set up on fixed cycles, the sponsor prohibited transfers from

SPEDY to YCCIP. There was no problem with a reverse flow. In Waterbury, all jobs paid the minimum wage, but the SPEDY jobs permitted more hours of work each week. As a consequence of the differential, well over half of the in-school enrollees switched to SPEDY. Marin County encountered a similar situation in which its SPEDY program offered more hours of work. During the summer, the YETP termination rate there was much higher than anticipated.

Qualitative differences between SPEDY and other youth jobs also affected job seeking strategies of youths though, to a lesser extent. In Cobb County, YCCIP participants dropped out of jobs that actually paid more and subsequently took SPEDY jobs. The YCCIP jobs were physically demanding and included maintenance and cleaning. The SPEDY jobs offered a greater choice of worksites and work assignments. In El Paso, year-round jobs paid the same, but youths transferred to SPEDY because the summer jobs were seen as being easier and more enjoyable. Where summer programs were not greatly enriched with career exploration classes and counseling, prime sponsors anticipated youth leaving the comprehensive YETP programs for more work experience with SPEDY. The sponsors, accordingly, took steps to prevent such transfers. Planners in Cobb County, anticipating that youth would try to avoid the academic components of YETP, prohibited transfers from YETP to SPEDY. Santa Clara put in similar restrictions.

Who Did SPEDY Serve?

Prime sponsors consistently reached or exceeded their planned overall enrollment levels for the summer program. The differing eligibility standards for YCCIP, YETP, and SPEDY did not cause the problems with interprogram transfers that some observers had feared because sponsors had enrolled mostly economically disadvantaged youth in YETP and YCCIP; consequently, transfers had no trouble meeting the SPEDY eligibility standards. Furthermore, the universe of need, large relative to the number of jobs SPEDY could provide, remained unfilled in most areas. Even Albuquerque, with its Youth Incentive Entitlement Pilot Project competing for youths to fill jobs, had no trouble finding eligible youths for summer jobs. In an effort to expand the number of available jobs, Chicago SPEDY administrators set up a two-tier program providing reduced hours of work to youths under 16. The city created enough jobs to serve 46,000 youths -- 119 percent of plan -- and still turned away eligible applicants. One exception to the high actual/planned performance of SPEDY was Clark County which barely broke 80 percent of plan. Though fewer enrollees than possible were enrolled, the sponsor did serve more youth than in any previous summer program.

Prime sponsors did well in meeting their overall enrollment targets, but showed mixed performance in serving some subgroups. As anticipated, SPEDY concentrated heavily on an in-school population. This pattern was reinforced by the practice of transferring to SPEDY large numbers of youth in YETP, which serves mostly an in-school population. But, for the sponsors singling out drop-outs for special attention, none reached their planned level. Connecticut Balance of State, for example, reached only 12 percent of plan; Kitsap less than 5 percent and Portland 4 percent.

A surprising number of prime sponsors put a special emphasis on serving youths under 16 years. The emphasis took the shape of efforts to recruit 14-15 year olds and special programs for that age group. Because the entitlement project in Albuquerque concentrates on serving 16-18 year olds, administrators were able to enroll greater numbers of younger youth than ever before. Rockford, learning from past summers when they had large numbers of 14-15 year old eligibles, carved out a special summer program for them, featuring shorter hours and a greater emphasis on classroom and other experience for which academic credit could be awarded. The North Carolina Balance of State sponsor, recognizing a need for early work experience, and the limited opportunity that 14-15 year olds have for gaining such experience with non-government employers, targeted all its SPEDY projects on that group of youngsters.

The emphasis on 14-15 year olds does have its problems, however, when it comes to work experience. They are the least job-ready and face the most legal restrictions on the hours and kind of work they can do. Greene County, the only sponsor in the sample to evaluate the comparative quality of summer jobs for 14-15 year olds, found that the summer jobs were markedly inferior to the YETP jobs for older youth, and blamed the differences on restrictions on the kind of work that 14-15 year olds can perform.

Effects of SPEDY/YEDPA Interaction

There is evidence that YCCIP and YETP had a positive impact on the 1978 SPEDY program. It was enriched with components going beyond the usual summer work experience, and it appeared to be able to capitalize on the stability of the year-round programs. But there were signs that it might be a mistake to simply downplay the part of work experience in SPEDY. As it stands now, SPEDY has a following among youths looking for nothing more than a summer job; it is a following that could be alienated, especially if the rather modest expectations of a popular, short-term work experience program were replaced with the higher expectations of a still-untested model for enriched services.

Cutting in the other direction, it appears that YEDPA might learn from the history of the summer youth program. The basic predictability of the program has encouraged a self-starting local planning process, generally smooth administration, and a modest ability to try innovation.

Local Accountability

Under a system of decentralized, decategorized service delivery, local CETA sponsors are more than local offices for spending federal dollars. The basic federal policy set forth in YEDPA, for example, is seen simply as the base on which local policymakers build programs adapted to local needs. Accountability in the system is at two levels. On one level, local sponsors are

accountable to the Department of Labor to comply with the laws and federal regulations governing client eligibility, local participation and clearance procedures, allowable costs, program activities and reporting requirements. At another level, there is assumed accountability to local policymakers, a mandate for local sponsors to assure that their programs are adapted to local conditions and responsive to local needs.*

In the course of prime sponsor implementation of YETP and YCCIP, the notion of accountability has evolved much the same way it has evolved throughout the development of CETA. Mechanical compliance with federal standards has taken precedence over attention to the impact of local initiatives. With a few exceptions, success at the local level is still measured in terms of whether prime sponsors get their allocation, enroll sufficient numbers of clients, and, perhaps most importantly, keep their noses clean. This pattern has important implications for how local sponsors collect data, the importance they attach to its accuracy, and the way local experimentation and evaluation is carried out.

Prime Sponsor Data

The kind and quality of data to which prime sponsors have access varies across prime sponsors and according to the kind of data. Demographic data on universe of need and economic data for describing local conditions are not checked carefully for accuracy simply because they do not form a basis for any real decisionmaking. Earlier reports on implementation of YEDPA have documented both the unreliability and inaccuracy of the data, and their lack of utility. Decennial census data are badly outdated. Prime sponsor jurisdictional lines frequently do not follow SMSA lines and state and local government agency administrative data are not considered reliable. Not needing the data for their own purposes, local planners readily pass along whatever is available as a gesture of compliance, since they have neither the time nor inclination to generate anything on their own, nor the need to use it.

Eligibility data, a subset of the client characteristics data that sponsors report to DOL, as well as activity data and cost data which all prove important in demonstrating sponsor conformance to laws, regulations and their own plans, are a different story. The stakes are clear and the incentives, therefore, more compelling. Paycheck errors, of course, receive fast attention because sponsors hear about them quickly. Some sponsors go to lengths to assure accuracy of data in which errors are not so obvious nor the consequences so immediate. In determining eligibility, some require W-2 statements from employers, caseload reports from social workers or verification from schools, in addition to signed statements from parents.

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*There is a larger issue of accountability, which will be taken up in the final report, and that is the aspect which pits the local agenda against the national agenda. When looking at that aspect of accountability, a major consideration is how prime sponsors can in reality serve local priorities while appearing to serve national priorities.

Program data are subject to a number of sources of error. Some of it can be attributed to the newness of YEDPA. It brought with it new categories of clients, different eligibility requirements, and more complicated requirements for breakdowns on age, education, and labor force status. This has meant new definitions for program personnel to learn, and during the break-in period, errors have been frequent. Northeast Georgia and Cobb County, both relying on the Georgia Department of Labor for their data processing, have found errors in their reports that it appears can be traced to the unfamiliarity of local and state staff with details of YEDPA. The use of subcontractors and the new role for LEAs have introduced new players to the manpower business and there is an expected break-in period for those personnel, as well as resistance to what some see as unnecessary red tape.

The information systems are another source of error. Again, the newness of YEDPA seems to be the cause, but the problem is compounded here because the bugs in the system limit the evaluation and data analysis capabilities of sponsors. Oregon BOS is forced to rely on bi-weekly telephone updates from subcontractors to verify accuracy of operation reports. The prime sponsors in Michigan are hoted for putting a great deal of energy into assuring that the data in their systems are accurate, but the payoffs seem to provide sufficient justification: Muskegon and Kalamazoo staffers point to high ratings on DOL field audits as the payoff; Grand Rapids can boast of never having a disallowed cost.

About half the prime sponsors collect data beyond that required by the Department of Labor. Some go beyond the requirements by calling for monthly progress reports. Others require more extensive detail on program operations, client characteristics and client post-program activities.

The prime sponsors requiring more than the minimum kinds of data usually do so for some evaluation purposes. Muskegon, for example, requires participants and supervisors to evaluate one another monthly. Clark County requires additional information and data breakdowns as well as more qualitative assessment from both its sponsor information system and its contractors as a guide to overall management. Greene County interviews participants, supervisors, program directors, counselors and intake workers for the purpose of assessing operations, program content, and impact on participants. In DeKalb and Northeast Georgia, the prime sponsors go no further than collecting the required data, but the LEAs with contract authority are building a more extensive data base so they can measure participant performance. Atlanta compiles data weekly on terminations and enrollments in anticipation of doing an analysis of planned versus actual performance. It is not clear, however, that the collection of extra data, per se, gives a prime sponsor an edge. Rather, it only seems symptomatic of more conscientious management.

Knowledge Development and Evaluation

At a more sophisticated level of accountability, local sponsors stress the importance of assuring program effectiveness. But this kind of accountability is relatively rare. It is not required and the rewards are fewer. Measuring

program results is more difficult than keeping financial accounts straight and the findings much less definitive. The "Knowledge Development" mandate encouraging prime sponsors to innovate is an attempt to make local administrators more sensitive to the effects of their initiatives on enrollees. While the mandate does little to increase the explicit rewards for local experimentation, it does provide some models for innovation and stresses the implicit value of examining program results and modifying operations accordingly.

The first year of experience with knowledge development provides few examples of well documented innovations that were useful to local policymakers. While the knowledge development mandate was not especially successful in the first year in establishing worthwhile local experimentation, it did nudge local sponsors one step closer to trying innovative approaches and documenting the results of them. Knowledge development did not provide a formula for sudden-change, but it shows signs of stimulating longer-term change. Detroit, lacking definite plans for knowledge development last year, will test the effectiveness of a performance-based system of accountability in the design of an alternative education system for youth. After a disappointing follow-up to a plan in which contractors were to undertake their own knowledge development, Grand Rapids is trying a similar approach again, only with monitoring by staff.

In some cases, relatively sophisticated plans were scrapped in favor of simpler tests. Clark County originally planned to test the impact of YCCIP on increasing school retention. That plan has been discarded, however, in favor of a more modest -- and probably more useful -- plan to interview participants to get their impressions about the program and its effect on their behavior. Oregon Balance of State tried a mixed income test for fiscal 1978, but was unable to test for a number of important variables. The original design was dropped in favor of a more qualitative approach to assessing program performance. Next year Oregon will try to compare the relative effectiveness of programs with and without academic credit.

There were some first year successes. Lane County, another sponsor which attempted a fairly sophisticated design to test the results of pairing retarded youth with normal (YETP eligible) youth, abandoned its original research design, but nevertheless came up with results that were worked into 1979 programming. Kitsap County, after establishing the value of individual learning plans, is adopting them for other youth programming. What is more noteworthy than the specific findings is the fact that the first year's experience is forming a jumping off point for further innovation. For the sponsorships in which first year experience did not pan out, local evaluators are willing to try different tactics that appear better suited to local purposes.

In the previous two reports on YEDPA implementation, the prime sponsor reaction to the "Knowledge Development" mandate of YEDPA was analyzed. The emphasis on trying innovative program approaches, documenting the results and divining some lessons has met with mixed results. But in order to gauge the likely useability of knowledge development and to gauge the impact it could have eventually on prime sponsor operations, it is instructive to see what they are already doing in the name of evaluation, since that is an activity with the potential of taking sponsors beyond the concern with day-to-day operations.

At a minimum, prime sponsor evaluation encompasses monitoring subcontractors and overall prime sponsor actual performance and comparing it to planned performance. Where actual performance deviates significantly from planned performance, corrective action is taken either to alter performance or modify the planning figures on file with the Department of Labor. Although the principal purpose of monitoring is enforcement, many prime sponsors carry evaluation far beyond that level. Charlotte is spending more on administration in fiscal 1979 than before, partly so that local administrators can get a clear idea of how good their work experience is. Each subcontractor is visited at least once, and some two or three times a week, so that staffers are thoroughly familiar with operations. Clark County, taking advantage of the cohesion that comes with a small staff and a central intake unit, is able to keep the entire top staff apprised of progress with the youth programs. Weekly site visits are made to monitor subcontractors and provide the basis for a running account of operations.

The bad press that CETA has received has, no doubt, provided much of the impetus for monitoring and "process" evaluation that sponsors are doing. But a comprehensive evaluation system needs to be able to provide diagnosis in terms of why performance is above or below plan, as well as details on program results. In Clark County, the effectiveness of evaluation is increased because local administrators have formulated operational objectives that provide reference points for judging performance. Evaluators in Lansing, separate from the office running the computerized information system, are responsible for running a mixed income experiment and collected job retention data and did a pre-post program wage analysis of participants in the summer programs. Atlanta has contracted with outside evaluators to profile and analyze program impacts on enrollees. Muskegon is collecting semiannual information on achievement, client characteristics and labor force status. It also administers monthly participant evaluations and is analyzing the components of its delivery system.

Despite promising achievements with respect to evaluation of some sponsors, most face considerable obstacles before they will have well functioning systems. The compliance function of evaluation commands first attention, because constant changes in programs and regulations keep administrators from establishing routines. Learning and relearning take up too much time. There is also a lack of vision of how to move beyond that. Many sponsors are not translating the ambitious goals in their plans into operational objectives. When groups for special emphasis are identified, sponsors are not specifying in their plans how they will be enrolled. While evaluations indicate that performance deviates from plan, they are not particularly useful for indicating why or how the deficiencies can be corrected. As part of its knowledge development plan, Portland, for example, tried to establish a performance contracting system. Although quantifiable objectives and milestones have been incorporated in prime sponsor contracts, a lack of technical assistance and ongoing monitoring limited the utility of the project.

Further progress here is going to be hard. Data collection and evaluation cost resources, time, and energy. They require an investment for which the payoff in improved programs is uncertain and the rewards either nonexistent or subordinate to the rewards for clean, though uninspired, management.

The "new CETA," as amended in late 1978, also is likely to have a negative effect on local efforts to evaluate program effectiveness and try innovative program approaches. The new regulations are complex and will require that sponsors invest much energy to assure that they are in compliance. The heavy emphasis on stopping "fraud and abuse" is also bound to inhibit innovation by encouraging sponsors to stick with established and safe programs and not risking anything new which might be more effective, but by its novelty, might invite more scrutiny.

The Difficulties of Spending on Target in 1978

Earlier reports have documented the variety of programs that sponsors were able to implement on short schedules. But their accomplishments in establishing new programs belie the difficulties many faced in sticking to their plans, and in achieving sustainable enrollment and spending levels. The difficulties posed by late starts were compounded by the changing national policies. A few sponsors were able to start in January 1978, but typically, they did not get underway until March or April. Some had less than four months of programming in the first year.

The short 1978 program year and the expectation during late 1977 and early 1978 that the Congress would boost sponsor allocations by 50 percent with a half billion dollar supplemental appropriation, dictated rapid acceleration in sponsor enrollments and spending. As start-ups were delayed, the federal pressure for fast enrollments intensified. By late spring, however, the message was reversed for two reasons: first, the administration decided not to request the $500 million supplemental appropriation, and second, in face of declining youth unemployment, President Carter requested new funding for 1979 youth programs at a level below that for 1978 based on a planned carry-in of the 1978 funds. To meet this new mandate, the Department of Labor suggested in June that sponsors carry in 27 percent of their 1978 allocations in order to avoid program disruptions.

On the prime sponsor level, the changing funding levels do not appear to have done serious long-term harm to local efforts. Effects of the shifts at the national level were damped out by slow and unclear transmission of the signals by the regional network. The effects of sudden changes in emphasis were further diminished by implementation lags which left most sponsors in the position of under-spending by the beginning of the summer. Consequently, national enrollment and spending patterns in the first year show fairly even growth with no abrupt shifts in direction.

On the national level, aggregate spending was low enough to assure much more than a 27 percent carry-in. It was 38 percent for YETP and 37 percent for YCCIP. But it is unclear how much of that carry-in can be attributed to the announced changes in funding levels and how much was an inevitable surplus that could not be spent because of the late program starts.

While the effects of the funding changes were not as serious as they might have been on the local level, prime sponsors were forced to make adjustments. The precise response to the mid-June advisory dictated different adjustment strategies according to how far sponsors had gone in implementation. For Columbus, the slowest starting sponsor of those studied, the signal changes and the carry-in mandate had no effect because enrollments were extraordinarily low. Because of its slow start-up, Columbus will be carrying in sufficient funds, which when added to their 1979 allocation will increase YEDPA resources for 1979, despite a 33 percent allocation reduction from 1978 to 1979. Portland, although doing a better job of implementation than Columbus, also encountered delays. A major project required an unexpectedly long planning period. Project clearances through the local government took extra time, and organizational problems within the prime sponsorship put a drag on the enrollment process. Portland had no trouble spending less than 73 percent of its 1978 allocation. Cook County, which did better than Columbus or Portland in starting up, had difficulty later in obligating all its funds because of enrollment shortfalls. Consequently, the slow-down order did not have an adverse effect there, either.

The sponsors that had slow start-ups, and then had compensated by accelerating up to high enrollments, had to make more serious adjustments during the summer. Oregon Balance of State peaked in June and then took July and August to slow down. It was decided not to use SPEDY as a safety valve, and so spending was braked by freezing YETP enrollments and by taking pressure off subgrantees that were behind plan in their enrollments. Thanks to these measures, it finished 1978 being able to carry in 25 percent of its 1978 allocation.

Sponsors that did not encounter extraordinary circumstances in the early implementation phases were forced to take more deliberate action in order to be able to carry in some resources. After some early delays, Kitsap got up to plan, and by early summer, planners were expecting to spend the entire 1978 allocation. Administrators there were able to cut spending to 73 percent only by suspending YCCIP and YETP enrollments, and transferring those clients who were eligible, into SPEDY. Chicago slowed enrollments and used attrition to drive down spending. Greene County, which reached peak enrollment remarkably fast, was harder-pressed than most other sponsors when told to carry in 27 percent of its 1978 allocation. Administrators there transferred those YETP enrollees who were eligible into SPEDY. But since that permitted only half the desired carry-in, a large number of the remaining YETP enrollees were terminated from the program.

Clark County, one of the first sponsors in the country to have its plan approved, was spending and enrolling on schedule when the carry-in directive was received. Administrators there made the decision to continue their course with only minor adjustments. Although the sponsor finished the year enrolling 97 percent of the planned level, it managed to carry 14 percent of its 1978 allocation, thanks to lower than anticipated unit costs in some activities.

On the whole, sponsors proved resourceful when told they would have to carry funds from 1978 into 1979. The news, although not welcomed, was accepted as a fact of life. The garbled spending messages and the confusion

caused by some regional office interpretations, however, were not so palatable, and caused a greater amount of rancor. As one field associate said: "The point all prime sponsors would make is that they can deal with just about any instructions as long as they can trust in their certainty." (Myron Roomkin, Page G-13).

Planned Versus Actual Performance

If YEDPA were nothing more than a lump-sum increase in resources for local employment and training programs for youth, first year planning and operations would probably have been much easier. But YEDPA is filled with specific mandates and local sponsors had to exert extraordinary effort in order to get operations underway in fiscal 1978. Some complex program activities required a great deal of ground work before they could start. New contractors, eligibility criteria, organizational components, and services introduced new variables in projecting enrollment and spending rates. The funding changes and experience with program operations prodded sponsors to modify their original plans repeatedly.

One way to make some sense out of the first year of YEDPA experience is to compare planned and actual performance with respect to cost per enrollee. This approach provides some insight into weaknesses in operations and plan estimation procedures. There are limits to how seriously such analysis can be taken. Data used in the case studies based on those reported to the Department of Labor on a quarterly basis are not complete for all prime sponsors. Nor are they comparable; there is great unevenness where the reported planned data do not reflect modifications in effect, definitions of program activities vary from sponsor to sponsor. Because of shortcomings in the data, discrepancies between planned and actual performance are not precise and comparisons between sponsors not likely to be fruitful. But, although the analysis obscures a good deal of detail, it reveals issues that should be addressed. The discrepancies are fairly reliable for flagging the variables that present the greatest uncertainties for local planners and pose obstacles to implementation of local programs. When considering discrepancies, together with the detailed analysis from the case studies, patterns do emerge.

In YCCIP, a program envisioned originally as a straight work experience program aimed primarily at high school drop-outs, actual per-enrollee costs were below planned levels for all of the sponsors for which data were available (about half of those in the case studies). The vast majority of the sponsors studied were below 80 percent of planned; nationally, per enrollee expenditures were 62 percent of plan

High turnover and low spending produced the low ratios. Turnover among YCCIP enrollees was higher than expected because the YCCIP jobs were strenuous and demanding, and paid minimum wage. The youths served in the jobs -- drop-outs -- found that for the same effort, they could get better money elsewhere, and so they left. The lack of any non-work services such as remedial education and counseling services, while lowering per-enrollee costs, have contributed to high turnover. Because of the high turnover, nearly

every sponsor studied exceeded their planned enrollments, without exceeding expenditures, driving down the planned/actual per-enrollee cost. The national patterns were about the same, with fourth quarter enrollments outpacing costs 114 percent to 70 percent.

The YETP picture is more complex than that for YCCIP because YETP activities covered 6 areas in addition to work experience: classroom training, on-the-job training, vocational training, career awareness, transition services, and career exploration experience. Four of these categories dominated sponsor service matrices: classroom training, OJT, work experience, and career exploration experience. Of those four, work experience and career exploration experience were utilized most frequently.

The ratio of actual/planned per-enrollee cost for YETP varied from sponsor to sponsor over a much greater range than in YCCIP, going from less than 10 percent to nearly three hundred percent. Ratios for most activities, however, were in the 60-100 percent of plan range. Nationally prime sponsors and state programs rose from 60 percent at the end of March 1978, to 92 percent at the end of September.

The miscalculations in planning and the snafus in operating YETP programs implied by these discrepancies were understandable and could be anticipated. Many of the services were new and required contractors to develop new capabilities. This caused delays and built in unpredictable cost variables. With the new programs, there were also uncertainties with respect to enrollee performance and turnover, both factors affecting costs.

Table 2 summarizes the distribution of actual/planned per-enrollee cost ratios for different activities.

Table 2

Percent of Planned Per-Enrollee Costs
Actually Spent in Fiscal Year 1978

YETP Services	≤50	51-60	61-70	71-80	81-90	91-100	101-200	>200	Total
Classroom Training	1			2	2	2	3	2	12
OJT	3	1				1	2	1	8
Work Experience	2	2		1	2	1	1		9
Career Exploration Experience	2	1	2	1	3	3	1	1	14
Other	1		2	1					4
Total for YETP Services	9	4	4	5	7	7	7	4	
YCCIP Work Experience	6	2	4	3		3			18

The experience of the sponsors covered in the case studies seems to bear out the picture implied by national enrollment and spending data. They show enrollments consistently outstripping spending; cumulative enrollments for the last quarter of 1978 exceeded plan for the two largest program activities. Most of the sponsors reporting planned and actual enrollment and spending finished the year at or below 100 percent of planned per-enrollee cost. In three-fifths of the program components of those sponsors, actual enrollments not only ran ahead of spending, but exceeded planned enrollments. In these cases, well-established local service deliverers were able to locate and recruit clients quickly, thanks to existing access to the community through other CETA activities or by virtue of being LEAs. Spending lagged behind enrollments and, in nearly every case, behind plan, most frequently because it appears that sponsors simply mis-estimated costs. But systemic quirks also reduced spending rates. Charlotte, expecting to run components through the local schools had some difficult relations with them that hindered implementation. In Muskegon, two schools, which had been slated for participation, were eliminated in a LEA reorganization. A major CBO there also encountered difficulties when the state attorney general ruled that a state match of YEDPA funds was not legal.

Lags in spending were not always symptomatic of bad planning or shortcomings in overall operations. In some areas they signalled well-run operations in which expected expenditures were not made because of unanticipated high degrees of cost sharing with non-CETA agencies. In Greene County, actual spending ran lower than estimates because the major program deliverer in the area is a large CBO that was able to absorb many costs in its large base of operations. The sponsor was able to obtain services at no cost from community agencies and a local university. Kalamazoo's low spending can be attributed in large part to a tightly-run centralized system of control and monitoring, and a willingness to put pressure on the LEAs to run quality programs.

Lane County was the only sponsor reporting more than one activity in which actual per-enrollee costs consistently exceeded planned costs. In only one of those activities, however, did expenditures exceed plan. Most of the distortion was due to underenrollments caused by late start-ups. But unique characteristics of the programs in Lane County seem to be an important contributing factor. The programs, designed for a high-risk population (twenty-eight percent of the YETP enrollments there were young offenders), were enriched with a variety of services.

The rest of the sponsors had mixed experience with regard to actual versus planned per-enrollee costs. In almost every case in which they greatly exceeded planned levels (more than 50 percent above plan), the errors were due to higher-than-expected expenditures; enrollments were close to expected levels. For those who were under, cost miscalculations again were more frequently a cause for discrepancies than were enrollment miscalculations.

Looking at experience across program activities, the most notable finding was the lack of success of sponsors in establishing and maintaining on-the-job training components for young adults. Per-enrollee costs for OJT varied from less than 10 percent of expected per-enrollee costs to more than

200 percent, depending on who was responsible for slot development and the precise problems encountered. The great variations are due in part to the small numbers involved (OJT consistently was a small component -- less than 5 percent of the enrollments in any sponsor). Clark County, spending 173 percent of the anticipated cost for an OJT slot, originally planned 10. But when the CBO responsible for OJT positions encountered difficulty developing slots, that number was cut to 2. Although they were both filled, there were costs that had to be covered for the early futile efforts. Greene County, remaining at 2 percent, had similar difficulties; but since it used inhouse staff, it did not pass on the extra development costs when only a few slots could be arranged. Because OJT was a small component, its development commanded less attention than some of the larger components. This, no doubt, restricted accomplishments. But it is also probably not an appropriate component for youth. As difficult as it is for sponsors to develop OJT positions for adults, youths are at an even greater disadvantage. One counselor asked: "How do you get a businessman to take an untrained kid on an OJT when he can get an adult just as easily from the CETA program?" (Bonnie Snedeker, Page I-12). In light of the 1978 experience, sponsors are reducing OJT and in some cases eliminating it altogether.

PLANNING FOR 1979

After the ordeal of fiscal 1978 planning, prime sponsors hoped for a more relaxed planning cycle for fiscal 1979. In fact, legislative and funding uncertainties clouded the second YEDPA planning cycle, precluding "normal" planning once again. CETA (and YEDPA) reauthorization was not final until mid-October, and allocations for 1979 were not settled until even later. But within the constraints imposed by delays and uncertainties at the national level, planners managed to make changes in local programming.

The Dynamics of Local Change

Local administrators learned from the YEDPA experience and incorporated the experience into changes that can be roughly catalogued into three categories: changes in procedures and operations, institutional relationships, and policies.

Changes in Procedures and Operations

The easiest changes have been procedural. After reviewing first year experience, prime sponsors are changing some of their operations. Eligibility determination, where it has been done by the Employment Service, has gone smoothly. But intake operations have been reorganized or relocated in some cases. One of the most radical changes is in Atlanta where YEDPA-eligible youth were being referred for services without regard to individual needs or overall employability development strategies. The cost was high turnover for both YCCIP and YETP. The intake system is being overhauled and a needs assessment phase is being built in to screen youth, then provide career exploration services, orientation and counseling. Once clients have gone through the core activity, they are referred to other YETP components, YCCIP, or Title IIB-C programs. Remedial education and skill components have been added for youth entering in 1979 because so many of the 1978 enrollees -- including high school graduates -- were found to have low achievement levels and needed basic education to increase their employability. Rockford is trying a variation on that approach, stratifying youth by age and enrolling different age groups in different service modules. Programs there will provide assessment services, remediation as needed and graduated exposure to work. Planners in Albuquerque-Bernalillo are instituting a comprehensive assessment system for all CETA clients. Because of the local announcement and bid review procedures for YCCIP, and the relatively small allocation for the program, many sponsors see it as being more trouble than it is worth. In the turmoil of planning for 1979, YCCIP occasionally was relegated to the back-burner.

Changes in the Institutional Roles

There were more difficult shifts in institutional responsibilities for aspects of the youth programs. They are important because they imply that certain turf lines and bureaucratic roles are not fixed, and are subject to change through YEDPA. In Alamance, the prime sponsor increased the 1979 LEA share of its YETP allocation more than three times over the 1978 level. The increase is a consequence of good CETA-LEA relations and the decision to add two student subpopulations as target groups: high school students enrolled in vocational education and high school students who are unemployed. The presumption is that the schools are in the best position to identify the students and mesh YETP services and work experience with the curriculum. In Lane County, there was a shift of responsibilities to rationalize overall program delivery. Because of the difficulties that LEAs there had with the enrollment process and eligibility criteria, enrollment and certification are being moved to the prime sponsor. The LEAs, however, are increasing the emphasis on the services that they are better adapted to provide, such as job search seminars, career information, and community college classess. While the LEA percentage share is not being increased in 1979, the funding is, thanks to the carry-in. Further-reaching changes, while deemed possible in Lane County because of good CETA-LEA relations, are not occurring because of the short planning period.

Clark County, another sponsor with good LEA relations, has shifted to the LEA responsibility for certifying each work experience job site as being career-related. Last year the prime sponsor had that responsibility. The decision to shift the responsibility also probably provided more incentive for the schools to agree to award academic credit for program experience in 1979. In Cobb County, the local vocational-technical school is acting in a referral role in 1979 to assure a flow of clients to YETP. One of the local boards of education still has not signed an agreement and the local high school will not refer students until the last quarter of the senior year.

In an institutional shift in private sector relations, Cobb County decided that it could drop the services of a private corporation that had been instrumental in establishing a sponsor training program with a major corporate employer in the area. The private intermediary almost certainly acted as an indispensable catalyst for the first year operations; but in the second year, after chain-of-command problems developed, the prime sponsor decided it could contract directly for the services.

Although these kinds of institutional shifts were important, the absence in other instances of institutional change from 1978 to 1979 was not necessarily a bad sign. In the Lansing Consortium, where there is little change in the level of funding or the kinds of programs run by the LEAs, the lack of change is a sign of stability more than inertia. The consortium has a history of cooperation with schools and both parties have reached an equilibrium. Routines have been established, and bugs eliminated; the LEA share of YETP also stands at nearly 80 percent. Detroit is fine-tuning

part of its operations, taking away from schools outreach and recruitment responsibilities for out-of-school youth, since the schools are not well adapted to reaching that population. Other than that, no major changes are planned. Kitsap County concluded its first 1978 school program with a meeting between district school counselors and CETA staff. Except for a funding switch that will pay for certain in-school jobs from YETP money instead of YCCIP money to permit more flexibility, little of substance is changing. There are no changes in the division of labor or program content. Here, too, some administrative tinkering is being tried, however, with the prime sponsor picking up some of the administrative expenses of the LEA program and providing the school coordinator with a PSE worker for clerical support.

In some other prime sponsorships, where institutional changes with LEAs have been minimal, it has not been out of satisfaction with present arrangements as much as out of external constraints. In DeKalb County, changes in LEA roles and activities are stymied by the funding uncertainties and planning delays. Oregon's proposition six putting a lid on local tax rates contributed to the air of uncertainty over CETA budgets by putting the LEA budgets in doubt. One school district concerned about budget uncertainties dropped a successful career exploration program that had been launched as part of the 1978 YETP activities. In Greene County there has been no change in the role of LEAs because the education community has little trust in the CETA system and is suspicious of federal funds. But Clark County administrators, finding that the county schools were unable to reach youth most in need of its YCCIP activities, shifted responsibility for YCCIP to a central city CBO and the county children's home.

Changes in Policy

Many of the first year YCCIP and YETP plans emulated the language of the DOL Youth Planning Charter and the legislation without much sense for the full implications of what they were saying. Furthermore, with limited planning time in the first year, prime sponsors also had little choice of service deliverers, which, in turn, restricted the client population that would realistically be served. As one planner in Oregon said, "Our service mix is based largely on the realities of local service delivery capability rather than on the mix of need." (Bonnie Snedeker, Page I-28).

In the second planning cycle, with the benefit of experience and more planning time, sponsors lowered the level of rhetoric and changed some policies to improve response to needs of target populations rather than the institutions. Cook County is improving implementation of services to drop-outs by having the LEAs offer programs for both those who agree to return to school as well as those who are interested in a GED, but would prefer not reenrolling in traditional classes. The County is taking further steps to bring jobs to the out-of-school youth by listing them with the local employment service and assuring that the youths are referred to the CETA intake office. In Northeast Georgia, part of the balance-of-state prime sponsorship, planners have backed away from returning drop-outs to school and are concentrating instead on

providing them with opportunities to earn a GED or attend adult basic education classes. Kalamazoo County is providing them with more occupational information. Kitsap County has decided not to target its entire YCCIP program to in-school youth, because it can serve that population better with the flexibility of YETP. Grand Rapids, for example, has kept its emphasis on negotiating agreements for academic credit; the ambitious goal of matching job assignments to client interests was relegated to the back-burner. In its report on 1978 YETP activities, the sponsors concluded that "admirable as YEDPA's goal of matching jobs with career aspirations is, legal, regulatory, and traditional limits far overshadow the goal in practical terms." (Peter Kobrak, Page C-22).

Apparently, some sponsors felt that first year YETP activities were going too far afield of employment and training objectives. The vague concept of career exploration is being sharpened so that programs have more specific work related services. Sonoma County is incorporating a very specific list of services and objectives in its LEA agreements. Lane County is shifting "away from a predominately social service intensive model toward a stronger employment and training oriented approach." (Bonnie Snedeker, Page I-26). As part of the new emphasis, LEA in-school programs will be stressing employability development planning. In making the shift, Lane County is relying heavily on non-CETA agencies to provide social services that the YEDPA clients need. In Albuquerque-Bernalillo, skill-training slots are being increased.

What is not clear after the second round of YEDPA planning is whether the largest changes to be induced by YEDPA have already occurred. The number of sponsorships that seem locked in by inertia, political or financial constraints seems small. Most have undertaken changes in policies and operations for the second year or are deliberately keeping options open by deferring major changes until planners have a larger base of experience. In those cases, contracts are being extended with little change. But the presumption among local youth planners seems to be for further changes.

THE LOCAL PERSPECTIVE

The principal focus of the case studies in the third interim report has been on variables important to the Department of Labor as it has tried to implement YCCIP and YETP, but not necessarily important to prime sponsors. In the course of implementation of YEDPA, local debates have covered some of the same ground as those at the national level: the pace of implementation, quality of jobs, funding uncertainties, knowledge development, and the role of schools. But a different set of implementation issues, not found in national discussions, has also been debated: the dilemma of local accountability without adequate local authority; accomodating competing mandates that are promulgated from different national offices with little concern for how they interact locally; the effects of adverse CETA publicity.

Local sponsors have had persistent problems in two areas: achieving stable staffing for local programs and achieving a cooperative relationship with the regional offices. The national Office of Youth Programs has not committed real energy to studying either of these areas. Although they have impacts on the operation and effectiveness of the youth programs, they are not germane to YEDPA alone and are not really "manipulable variables" -- factors over which national youth administrators have much immediate control. But they are intrinsic to the federal style of administering decentralized/decategorized programs, and, in the long run, can be affected by shifts in federal policy. For that reason they are worth mentioning.

Prime Sponsor Staff Stability

After overturning the results of the RFP process, the Columbus CETA director decided in the spring of 1978 to administer YETP in-house. But the sponsor's Youth Employment Service Center, lacking necessary staff, materials and facilities, did not open until June 19th and limped through the summer. Even by late 1978, YETP programs were not fully implemented. Aside from a leadership void caused in part by the CETA director trying to please two masters -- local elected officials and the U.S. Department of Labor -- the sponsorship is unable to change staff quickly in response to shifting program emphases and new legislation. CETA staff in Columbus are covered by civil service personnel management regulations. Hiring is a cumbersome and time-consuming process. It is easier to reassign staff from one program area to another. But this means that although PSE build-ups and YEDPA implementation mandates, for example, do not present competing priorities at the national level, they do locally: staff for one priority area must be taken from another.

One case study author who kept count found that in the first year of YEDPA operations, three of the five California sponsors being studied changed CETA directors. One of the sponsors also lost its youth director and two key youth staff. In three out of four sponsors studied in Georgia, morale was so low that staff were looking actively for other jobs.

An Eastern Middlesex YETP project collapsed when the sponsor's youth director and project director resigned, and the project instructors were fired. After some initial difficulties, a Boston YCCIP landscaping project got off the ground and flourished. Youths were receiving classroom training to complement well-supervised work activities. Staff and enrollees alike were serious about their work. But, by the beginning of the summer, the project was disintegrating. Staff were never able to get adequate equipment, and without that were unable to develop good worksites. Enrollees and project personnel alike became discouraged. By June, both supervisors had resigned and were replaced by interim supervisors who were completely untrained. In July, the project director resigned. A director and two new supervisors were hired.

In the Connecticut Balance-of-State youth operations, four persons have been working together fairly effectively. But there are no formal career ladders in the bureaucratic structure and no one knows what the advancement opportunities are. The Hartford prime sponsorship, long a political football, has been hit hard by turnover. As of November 1, 1978, only twelve percent of the CETA staff have been without the organization for two or more years. The youth programs have been especially hard hit by resignations or reassignments within the agency. As a consequence of the turmoil, there is no institutional memory and the effects of staff training have been almost totally washed out.

Portland, touted as one of the better sponsors in the country, has its share of problems. A CETA staff reorganization has hurt morale, among the youth staff especially. The youth office has lost its status as a line agency on the same level as adult and senior citizen divisions. Central staff supportive of the youth initiatives have quit and the supporters of adult services have emerged as the ones with power in the new organization scheme. Both the central youth office and the youth field netowrk continue to be understaffed. With a strong emphasis on linking CETA to local economic development initiatives, it is becoming apparent that possibly the only way to provide services adapted to youth will be to rely more on local schools.

Symptoms of staff instability do not necessary spell disaster. Even the Eastern Middlesex landscaping project experiencing complete staff turnover can claim some measure of success. Both the original and the replacement staff have been dedicated, maintaining contact with enrollees and counseling them on an informal basis. In early September, most of the enrollees -- all out-of-school youth -- indicated that they were planning to return to school. But a stable staff does improve the chances for success of any programs. The more stable sponsorships and projects usually also have better morale, lower turnover among clients, and it might be presumed, a better chance for being effective.

Horror stories about staff instability are not representative of local CETA or YEDPA operators in general. But they occur frequently enough to merit attention. It is hard to determine the direction in which causality runs when local operations are in a state of turmoil and prime sponsor staff are constantly changing. But the two go hand-in-hand and common sense makes certain aspects of the national style of CETA administration a likely villain. Where it is not the villain directly, it is indirectly by perpetuating policies that hinder local survival adaptations.

The federal administration of CETA appears to have material impact on sponsor operations in two (interrelated) ways that can affect local staff stability: first by leaving the sponsors politically vulnerable and second, to a lesser extent, by leaving them too little time to establish a local agenda.

CETA sponsor directors face a challenging balancing act when they try to serve two masters. The federal presence in CETA is unmistakable, and the law, regulations, and national priorities frequently are not compatible with local laws and administration practices or policy preferences. The CETA rhetoric of local authority and discretion frequently is hard to reconcile with the reality of federally-mandated review procedures that fail to acknowledge and allow inadequate time for local governments' own administrative review procedures. The rhetoric is hard to reconcile with regional office hard-line directives that are at odds with national office policy and common sense interpretation of the law and regulations, and further erode local discretion. Although the rhetoric gets through to mayors and county councils, the complexitities of administration do not. Local CETA administrators are left with the difficult job of explaining the inconsistencies.

The political durability of local sponsor staff is also undermined by the unique status they are sometimes accorded in local government. CETA offices, usually being entirely federally supported components of local government, are treated differently from other components of local government. They are not a line item on local budgets, except where non-CETA responsibilities are added, and CETA staff sometimes are not given the civil service protection that employees of other local government offices have. The lack of civil service protection and the financial insecurity caused by funding uncertainties reduce the appeal of CETA staff jobs. Furthermore, the sudden shifts in emphasis in Washington and the addition of categorical programs force constant staff reassignments and structural reorganizations. The climate of financial and organizational uncertainty takes a toll in staff turnover (to say nothing of program effectiveness). These factors, taken together with the relative newness of CETA, give CETA offices a sense of transience and a lack of perceived bureaucratic staying power.

Where CETA directors do not have the political muscle that can compensate for weak structure, they may try to avoid controversy or conflict with other local officials by maintaining a low profile and following a policy of isolated and undramatic programming. But when a choice is forced, CETA directors usually opt for legal accountability to the U.S. Department of Labor instead of political accountability to local elected officials. They can then find themselves forced to resign for being unresponsive to local decision-makers.

CETA staff stability suffers also because of the frustrations and uncertainties that attend the implementation of federal policies when there is too little time for them to map out a local employment and training agenda and plan programs adapted to it. YEDPA was implemented as an accelerated pace in which a great deal of the time between the first planning activity and program implementation was taken up with procedural reviews of hastily developed plans based, in part, on the recommendations of youth councils that

had met only once or twice and were never adequately briefed about the dimensions of youth employment problems or the relative effectiveness of past strategies for dealing with those problems. After local review and approval, the plans were hastily implemented with too little time to the administrative demands: hiring qualified staff, and determining what facilities and equipment were needed for programs and then obtaining them. The rush left little time for considering carefully strategic and tactical decisions, building local support, and forming coalitions. It meant instead, a game of catch-up in which sponsors had to strike out on their own, rush enrollments, and try operating programs without the benefit of a break-in period.

The lack of planning and program development time certainly was a contributing factor in the inability of the Columbus YETP to get started. It hurt staff morale and enrollees were quick to catch on and seek out other opportunities. The YCCIP landscaping project in Eastern Middlesex might have fared better had it started with the equipment and the worksites that it needed. Without the front-end time needed for proper project development, staff there had no better luck finding their work "meaningful" than did the enrollees.

The uncertainties hurt linkages with other institutions. Even where sponsor staff can adjust to the abbreviated planning cycles, administrators cannot, or can with only the greatest difficulty. The extra effort to plan and implement LEA agreements quickly did not ease the way for better CETA-LEA relations. It only introduced another source of tension. The delays in a go-ahead signal for a second year of YEDPA held up youth programs until well into the new school year. In a few cases, they were able to start on time when the LEAs and other local agencies went out on a limb either advancing funds directly for the second year programs or assuring some liability for them. In any event, the uncertainties and lack of planning militated in favor of a policy of incrementalism requiring a minimum of new work.

The youth programs have not been the only source of frustration for local sponsors, however. They have been merely one more in a series of frustrations associated with CETA. The delay in reauthorization of CETA and funding delays and uncertainties for all CETA programs typify the larger problems facing local sponsors. The ad hoc style of national manpower policy formulation by the Congress and the crisis style of management by the U.S. Department of Labor are the factors most frequently cited by the sponsors as the underlying cause of their planning difficulties.

The Role of the Regional Offices

The point of contact between prime sponsors and the U.S. Department of Labor is the office of the regional administrator. It is responsible for communicating to the prime sponsor notice about laws and regulations, and for passing on policy and administrative directives. It reviews and approves sponsor plans and answers inquiries about interpretation of laws and regulations. The regional office also acts as a conduit for technical assistance. In the formal administrative scheme, it is the gatekeeper for information and authority that sponsors need for their operations.

There is a predictable tension between sponsors and regional offices. It springs from the authority that the regional office has over local programs. Whether the relationship becomes contentious seems to depend mostly on whether regional office authority is exercised in a spirit of cooperation. Unfortunately, during implementation of the youth programs, non-cooperation has been a recurring, though not pervasive, theme.

In the view of some of the sponsors being evaluated, their contact with the regional offices with regards to the youth programs has been marked by too little attention to the spirit of YEDPA, the substance of program designs, or the effectiveness of program strategies. Instead, there has been frequently a fixation with mechanical compliance activity, pushing prime sponsor spending, and assuring that sponsors do not make waves. As one reason for rejecting a sponsor plan, a regional office objected to the use of time allocations expressed in fractions of percents. In another region, the office put pressure on a sponsor that had decided not to apply for YCCIP money. Yet the offices were oblivious to larger policy questions. For example, although the Columbus sponsor was not in violation of any laws and did indeed submit a plan on time, the total ineffectiveness of its implementation efforts escaped censure by the regional office.

Another problem some sponsors identified was the lack of timely information from regional offices, and the occasional distortions of national office policy. Early in the course of implementation, sponsors had difficulty obtaining answers to inquiries about the interpretation of YEDPA and the YEDPA regulations. These problems were compounded when regional office information was plainly wrong. One sponsor received the wrong estimate for its 1978 YETP allocations. Some sponsors were directed to keep SPEDY separate from YETP and YCCIP activities. Others discovered they were not receiving technical assistance material from the national office and found the regional office training to be addressed to narrow procedural concerns, paying little attention to strategic policy issues.

It is not hard to find reasons for the breakdown in the regional role of transmitting information and providing technical assistance. In the rush to implement the youth programs, the regions sometimes had no faster access than prime sponsors to interpretations of regulations or technical assistance material. Sponsors, under the gun to get plans out in a hurry, found it faster and more reliable to go around regional offices and contact the national office directly. Officials in the national office, after encountering resistance in the regional network to fast implementation, frequently cooperated in the end run. Regional personnel, often lacking experience, were also burdened with responsibilities for increasing public service employment enrollments. The extra responsibilities and the complexity of the new youth legislation made it difficult for them to cope with all the inquiries from local sponsors. It is not unusual for them to know far less about national policy on particular programs than local administrators. Unable to provide much useful information to prime sponsors, regional personnel seem to have found in many cases that the only way they can exert influence is administratively, though approval power over sponsor plans and program activity. Yet even there, regional office opinions are not final authority,

but are subject to reversal by the national office. Under these conditions, contact between sponsors and regional office officials exacerbates the natural tension between them.

The reasons for the poor relations that frequently exist between regional offices and prime sponsors are not hard to fathom, and the consequences are predictable. The solution to the problems that the tensions create are not so obvious. At a minimum they depend upon the Department of Labor determining, as a matter of explicit policy, what the appropriate role of the regional network is, and then standing by the policy.